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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of: )  
 )  
VERILINK CORPORATION )  
 )  
Petition for Rulemaking to Amend )  
the Commission's Part 68 Rules ) RM - 8158  
to Authorize Regulated Carriers )  
to Provide Certain Line Build Out )  
Functionality as a Part of Regulated )  
Network Equipment on Customer Premises )

**COMMENTS**

GTE Service Corporation, on behalf of its domestic, affiliated telephone, equipment and service companies ("GTE"), hereby offers its Comments to the Commission's Public Notice, released January 8, 1993, regarding Verilink Corporation's Petition for Rulemaking (the "Petition") requesting amendment of the Commission's rules referenced above. GTE supports the Petition and believes the issue being addressed, provision of line build out ("LBO") functionality in the transmission path of 1.544 Mbps ("DS1") services as a component of regulated network interface equipment located on customer premises, warrants Commission initiation of a rulemaking proceeding.

**BACKGROUND**

The question raised in Verilink's Petition has been the subject of multiple proceedings at the Commission before. In CC Docket No. 86-423, RM-5363, the Exchange Carriers Standards Association ("ECSA") advised the Commission

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that the then draft Standard for DS1 Interface only provided for a single pulse type to be generated by customer premises equipment ("CPE"), a pulse type similar to the Option A pulse identified in the Commission's rules.<sup>1</sup> In that same proceeding, Kentrox urged the Commission to change its rules to require the use of only the Option A pulse.<sup>2</sup> GTE urged the Commission to defer action on the Kentrox proposal until parties could address multiple concerns with the ECSA draft Standard.<sup>3</sup> GTE suggested a Petition for Rulemaking be filed after the Standard was finalized to allow the Industry to use the Standard.<sup>4</sup>

After a consensus standard was developed, BellSouth filed a Petition for Declaratory Ruling, or in the alternative, a Waiver requesting a declaration confirming that carriers were permitted to provide LBO in the regulated DS1 transmission path.<sup>5</sup> Such a ruling was perceived as facilitating implementation of the American National Standard for Telecommunications-Carrier-to-Customer Installation - DS1 Metallic Interface ANSI T1.403 in a technically- and economically-efficient manner. BellSouth argued that LBO in the regulated network interface was the most efficient manner and the only practical solution for implementing the new American National Standards Institute ("ANSI") standard. GTE supported an FCC determination that local exchange carriers

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<sup>1</sup> ECSA Comments, CC Docket No. 86-423 (Jan. 8, 1987).

<sup>2</sup> Kentrox Comments, CC Docket No. 86-423 (Jan. 20, 1987) at 4-5.

<sup>3</sup> GTE Reply Comments, CC Docket No. 86-423 (Feb. 10, 1987), at 9-12.

<sup>4</sup> Id. at 11-12.

<sup>5</sup> BellSouth's Petition for Declaratory Ruling or, Alternatively, Request for Limited Waiver of the CPE Rules to Provide Line Build Out (LBO) Functionality as a Component of Regulated Network Interface Connectors on Customer Premises, filed December 9, 1988, ("BellSouth Petition").

("LECs") could provide the LBO function as part of the regulated network for DS1 service, but maintained Part 68 rule changes would be necessary to accomplish this in a manner that did not adversely limit LEC flexibility.<sup>6</sup>

The Commission denied BellSouth's Petition on procedural grounds, concluding the BellSouth Petition did not identify an existing controversy regarding the interpretation of the existing rules.<sup>7</sup> The alternative Waiver request was also denied because the Commission viewed the implementation of a new ANSI interface standard having broad impact on the Industry and requiring consideration of the issues in the context of a rulemaking proceeding. The Commission identified specific issues that should be addressed in any future rulemaking petition seeking authority for carriers to provide LBO in the DS1 transmission path.<sup>8</sup> The Petition (at 6) states Verilink's contention that those FCC-identified issues are addressed within Verilink's submittal.

## **DISCUSSION**

### **GTE supports initiation of a rulemaking proceeding.**

GTE supports Commission initiation of a rulemaking proceeding to address amending Part 68 of the rules to authorize regulated carriers to provide line build out functionality as a part of regulated network equipment on customer premises. LEC provision of LBO functionality will eliminate the need for

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<sup>6</sup> GTE Comments, BellSouth Petition, (Jan. 30, 1989) at 2; 5, n.\*\*; and 6-7.

<sup>7</sup> BellSouth's Petition for Declaratory Ruling or, Alternatively, Request for Limited Waiver of the CPE Rules to Provide Line Build Out (LBO) Functionality as a Component of Regulated Network Interface Connectors on Customer Premises, DA 91-664 (June 6, 1991) at para. 26 ("BellSouth LBO Order").

<sup>8</sup> Id. at para. 30.

customer/carrier joint engineering, alleviate current user confusion, and reduce expenses. LEC provision of LBO will facilitate implementation of the ANSI DS1 interface standard, will not adversely impact current customers, will eliminate a potential source of network harm from excessive signal power causing cross-talk, and will simplify the design of CPE. Thus, the public interest would be served by amendment of Part 68 to allow LEC provision of LBO functionality on DS1 services.

### CONCLUSION

GTE urges the Commission to grant Verilink's request and initiate a rulemaking proceeding to address amending Part 68 of the rules to authorize regulated carriers to provide line build out functionality as a part of regulated network equipment on customer premises.

Respectfully submitted,

**GTE Service Corporation,**  
on behalf of its domestic,  
affiliated telephone, equipment  
and service companies

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February 8, 1993

Their Attorney

### **Certificate of Service**

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "Comments" have been mailed by first-class United States mail, postage prepaid, on this 8th day of February, 1993 to the following parties.

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Ann D. Berkowitz